

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

John Wayne, )  
 )  
 Plaintiff, )  
 )  
 )  
 ) CIVIL ACTION  
 v. )  
 ) No. 21-cv-4209  
 John E. Wetzel, et al., )  
 )  
 Defendants. )  
 )

## **PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR STAY OF ALL DEADLINES**

Defendants have asked that the Court either “stay” all pending deadlines, or extend all such deadlines by 30 days. While plaintiff does not agree with certain aspects of defendants’ stated basis for their request, plaintiff does not object to a 30-day extension of the deadlines. Plaintiff believes that this would be more appropriate than an open-ended lifting of all deadlines given the nature of the case, which involves at heart plaintiff’s challenge to the conditions of his present confinement.

Dated: December 13, 2023

Respectfully submitted,

/s/ Samuel W. Silver  
Samuel W. Silver (Pa. I.D. 56596)  
ssilver@welshrecker.com  
Richard D. Walk, III (Pa. I.D. 329420)  
rwalk@welshrecker.com  
Welsh & Recker  
306 Walnut St.  
Philadelphia, PA 19106

**CERTIFICATE OF SERVICE**

I, Richard Walk, hereby certify that, on December 13, 2023, the foregoing Response to Motion to Stay All Deadlines was filed electronically using the ECF system and is available for viewing and downloading from the ECF system, and a Notice of Electronic Case Filing was served on all counsel of record registered with the ECF system.

*/s/ Richard Walk* \_\_\_\_\_

Richard Walk